

2434985

JUSTICE COURT HENDERSON TOWNSHIP

Clark County, Nevada

Court Use
Only

CLARK COUNTY COLLECTION SERVICE LLC

Plaintiff,

-vs-

PATRICIA ARELLANO

Defendant.

CASE NUMBER: 15CH000791

DEPARTMENT: 1

SUMMONS

NOTICE: YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A Civil Complaint has been filed by the plaintiff against you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you exclusive of the day of service, you must do the following:

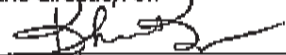
a. File with the Clerk of this court, whose address is shown below, a formal written response (Answer) to the Complaint in accordance with the rules of the Court. A \$71.00 filing fee is required.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

Issued at the direction of:



JPN

MAR 3 2015

Attorney for: CLARK COUNTY COLLECTION SERVICE

By:

DEPUTY CLERK

Date

Name: Brooke M. Borg #9326

Borg Law Group

Address: 8860 W. Sunset Suite #100-1

Las Vegas, NV 89148

Phone#: (702) 940-5197

Justice Court, Henderson Township

243 South Water Street

Henderson, NV 89015

NOTE: When service is by publication, add a brief statement of the object of the action.
See rules of Civil Procedure, Rule 4(b).

APPROPRIATE COURTROOM ATTIRE REQUIRED
NO SHORTS, HALTER TOPS OR TANK TOPS
SHOES ARE REQUIRED
(NO FOOD OR DRINK PERMITTED)

Brooke M. Borg #9326
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 Las Vegas, NV 89148
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HENDERSON JUSTICE
 COURT

2015 MAR -3 A 9:25

JUSTICE COURT, HENDERSON TOWNSHIP

CLARK COUNTY, NEVADA

FILED

CLARK COUNTY COLLECTION SERVICE, LLC (702) 940-5189 Plaintiff vs. PATRICIA ARELLANO Defendant(s)	Case No: 15CA00781 Dept. No: 1
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COMPLAINT

COMES NOW, the Plaintiff, Clark County Collection Service, LLC, a Nevada limited liability company, by and through its counsel, Borg Law Group, and for its cause of action against Defendant, states as follows:

GENERAL INFORMATION

Please be advised that this is an attempt to collect a debt and any information obtained will be used for that purpose. You should also be aware that consumers have the following rights. Within 30 days from the receipt of this complaint you may:

- a. Dispute the validity of this debt or any part thereof; if you do not dispute the debt, it will be presumed to be valid.
- b. Notify Plaintiff in writing that all or a part of the debt is disputed or that you wish to know the name and address of the original creditor if different from the current creditor; in which case Plaintiff will provide the requested information and obtain verification of the debt.

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JURISDICTIONAL ALLEGATIONS

1. Clark County Collection Service, LLC, a Nevada limited liability company (hereafter referred to as "Plaintiff"), is duly licensed to conduct collection services in Nevada.
2. Based on information and belief, Plaintiff alleges that venue is proper pursuant to NRS 66.010, subsection 7.
3. Fremont Emergency Services/Sienna ("Provider") with a location at 880 Seven Hills Henderson, NV 89052, is a Nevada business licensed to provide medical services in Henderson, Nevada.
4. Provider has assigned to Plaintiff, its rights to collect funds owed by Defendant to Provider pursuant to the terms of this complaint.
5. Service was provided in Henderson, Nevada.

BREACH OF CONTRACT

6. Plaintiff hereby realleges all previous Paragraphs and by this reference incorporates the same herein as though set forth in full.
7. On or about June 12, 2014, Defendant(s) entered into a contract for services with Provider (the "Contract").
8. The Contract states Defendant(s) would pay the amounts set forth in the Contract to Provider in consideration of medical services provided to Defendant by Provider.
9. Provider has fulfilled its obligations as described in the Contract.
10. As of February 10, 2015, Defendant(s) are past due and owing to Provider for medical services.
11. Defendant(s) have breached the terms of the Contract by failing and/or refusing to tender the amount past due and owing for the services described in the Contract when payment became due.
12. Plaintiff has made demand upon Defendant(s) for the amount due and owing but Defendant(s) have refused to pay.
13. Plaintiff is entitled to have and receive from Defendant(s) the balance owed for services, which amounts to \$371.89 plus collection fees and interest.
14. Plaintiff has been compelled to retain the services of legal counsel to prosecute this action, and on that basis, is also entitled to an award of attorney's fees and costs of suit herein.

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WHEREFORE, Plaintiff prays for the following relief:

1. For a judgment against Defendant(s) jointly and severally for the amount due and owing to Plaintiff in the principal sum of \$371.89, plus interest to be added at the statutory rate, plus any other fees accrued to date.
2. For reasonable attorney's fees and costs of suit incurred herein, and
3. For such other and further relief as this Court may deem just and proper.

Dated 17th day of February, 2015

Borg Law Group

By: _____



Brooke M. Borg #9326

8860 W. Sunset, Suite #100-1

Las Vegas, NV 89148

(702) 940-5189

Attorney for Plaintiff